



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

JUN 03 2016

Mr. Louis De Naples, President
Keystone Sanitary Landfill
249 Dunham Drive
Dunmore, Pennsylvania 18512

Re: Clean Water Act Section 308 Information Requirement: Request for Missing Response

Dear Mr. De Naples:

On October 16, 2015, the U. S. Environmental Protection Agency (EPA) issued a request for information that requires a response from Keystone Landfill (Keystone) pursuant to EPA's authority under Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318 (Information Requirement). While Keystone provided a response dated November 12, 2015, Keystone failed to provide complete responses to all of the information specified in that Information Requirement. Failure to respond in accordance with the instructions and deadlines set forth in the Information Requirement constitutes a violation of the CWA and may result in enforcement action under Section 309 of the Act, 33U.S.C. § 1319 involving civil or criminal penalties. This letter notifies Keystone of certain information that it failed to provide in its November 12, 2015 response, and hereby repeats the request for that information as specified below.

Keystone operates a sanitary landfill in Dunmore, Pennsylvania that discharges to Scranton Sewer Authority (SSA). EPA Pretreatment Program identifies specific requirements that apply to all Industrial Users (IUs) or nondomestic sources of wastewater to a Publicly Owned Treatment Works (POTW). The Pretreatment Regulations establish responsibilities of Federal, State, and local government, industry and the public to implement Pretreatment Standards to control pollutants from the industrial users which may pass through or interfere with POTW treatment processes or which may contaminate sewage sludge. The Keystone is a point source subject to National Pollutant Discharge Elimination System (NPDES) permit requirements under the CWA, 33 U.S.C. §1251, *et seq.*

Section 308 of the Act, 33 U.S.C. § 1318 authorizes EPA to require owners and/or operators of point sources to provide information related to compliance with the CWA. Pursuant to that authority, EPA issued the October 16, 2015 Information Requirement setting forth specific questions for information and instructions for response; to which Keystone provided a substantial response dated



November 12, 2015 (Response). This letter notifies Keystone of information missing from its Response and hereby repeats the request for information as follows.

In Paragraphs 26 and 27 of the Information Requirement EPA directed that Keystone:

26. Provide any and all flow data for all discharges for Keystone Landfill for the last month (September 1- September 30, 2015).

27. Identify each day of discharge during that time period and for each day, identify what line through which Keystone discharged wastewater to reach the SSA Collection System.

In its Response, Keystone provided the total volume of discharge during the month of September, and that all of its discharges during that month were discharged through the dedicated line to the SSA Collections System. **Keystone failed to provide, however, the discharge volume for each individual day of discharge (including September 24th and 25th).** EPA requests Keystone to provide that information as well.

In Paragraph 29 and 36 of the Information Requirement, EPA directed that Keystone provide a:

29. Description of how discharges are monitored and sampled (where and at what points and for what pollutants) and provide standard operating procedures (SOPs) for the collection and analysis of those samples.

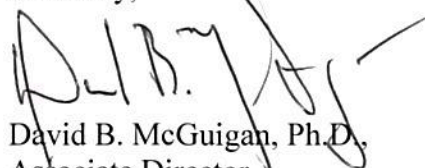
36. Describe sampling procedures and provide a sampling SOP for the dedicated sewer line and any alternative line.

In its Response, Keystone did provide a description of how discharges are monitored and sampled, but **Keystone failed to provide any SOP for the collection and analysis of those samples, or in the alternative, a response that there was no written SOP(s).**

EPA requires you provide a complete response in accordance with the instructions set forth in October 16, 2015 Information Requirement, and within 15 days of the receipt of this letter.

If you have any questions about this Request for Information, you may contact Mr. Steven Maslowski, Enforcement Officer at (215) 814-2371.

Sincerely,



David B. McGuigan, Ph.D.
Associate Director
Office of NPDES Permit and Enforcement
Water Protection Division

Enclosure

cc: Patrick Musinski, Water Program Manager, PADEP